

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Tuesday, April 24, 2018 11:18:44 AM

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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Tuesday, April 24, 2018 11:01 AM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS MEDICAL BOARD

First Name: Vicki

Last Name: Sanders

Title: President

Organization you are affiliated with: Society of Radiology Physician Extenders

Email:

City: Wichita Falls

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

I SUPPORT the TMB Staff recommendation, found on Page 5, to create a medical radiologic technology Radiologist Assistant (RA) certificate. Establish in statute an advanced-level medical radiologic technologist (MRT) certificate and define the term “radiologist assistant” as an individual who holds an advanced-level MRT certificate. Require that radiologist assistants only practice under the supervision of a radiologist, and require the Board of Medical Radiologic Technology, with approval of the Medical Board, to adopt rules for education and training, practice restrictions, and supervision levels required for radiologist assistants.

In the 2016 Sunset Review of the Texas Medical Board (TMB), the Texas Sunset Commission (TSC) unanimously approved a decision regarding recognition of the radiologist assistant (RA).

This decision establishes, in statute, an advanced-level medical radiologic technologist (MRT) certificate and define the term “radiologist assistant” (RA) as an individual who holds an advanced-level MRT certificate. Require that radiologist assistants practice under the supervision of a radiologist, and require the Texas Board of Medical Radiologic Technology, with approval of the Texas Medical Board, to adopt rules for education and training, practice restrictions, and supervision levels required for radiologist assistants.

The statutory amendment for this recommendation were added to HB 3040 and SB 315 for the 85th regular session of the Texas Legislature. The previously approved TSC recommendation for the RA should again be considered and previously submitted statutory language added to legislation in the 2019 Texas Legislative Session.

RAs are often unable to obtain credentials at Texas hospitals because they are not recognized in statute like other healthcare professionals working in a hospital. Hospitals cannot distinguish between the education level, qualifications, supervision levels, and scope of practice because RAs are not recognized in statute or rules. There are

also no set disciplinary procedures for RA who violate ethical or practice standards and no way to track the RA's supervising radiologist or radiology group.

The addition of the RA to the definitions in OC 601 will ensure that hospital organizations can credential RAs, establish supervision levels, and alleviate the need for future legislation if the federal bill are instituted. The need for the RA to be defined in state statute has been evident in the last six legislative sessions.

There is also federal legislation currently in the U.S. Congress (HR 1904 and S769) that defer to state supervision levels regarding Medicare payment to radiologists using radiologist assistants (RA). Because Texas does not recognize the RA in statute or establish supervision levels, Texas physicians could potentially lose Medicare payments for services performed by RAs under their supervision.

RAs and have obtained a Bachelor's or Master's degree through a recognized and accredited university program, as well as clinical training under a radiologist preceptorship. RAs works under the supervision of a radiologist to provide safe, efficient care in radiology, and can be especially effective in underserved and rural areas of the state where access to care is a concern.

RAs can be defined as "Registered Radiologist Assistants certified by the American Registry of Radiologic Technologists (ARRT) or Radiology Practitioner Assistants certified by the Certification Board for Radiology Practitioner Assistants (CBRPA) who work under the supervision of the radiologist."

An amendment adding the definitions of RA and radiologists will not increase the number of outstanding licenses. RAs already hold an MRT license, so this change would simply allow the RA to be recognized in statute as and the Texas Board of Medical Radiologic Technology (TBMRT) to make rules regarding the RA and conduct disciplinary proceedings.

The addition of the RA in statute would not increase the burden on TMB staff because a mechanism (check box) could be employed on the MRT renewal application which a RA can indicate they are a ARRT or CBRPA certified RA and a text box with which radiologist or radiology group supervises the RA (much like the Physician Assistant (PA) supervisory physician field) can be entered. There would not be an application process (education evaluation, etc.) for an RA or TMB to perform because all these processes are done through the certification agencies and TMB staff would verify that the credentials were received and that the RA is in good standing with the certification board. The TMB already has an established process for indication of supervising physician for the PA which can be used for the RA.

Thirty-one (31) other states have recognized RAs, and has come before the Texas legislature in the past six legislative session as address in the TMB self-study (p.145) this amendment would be supported by the Texas Society of Radiologic Technologists, the American Registry of Radiologic Technologists, American Society of Radiologic Technologists, Society of Radiology Physician Extenders, and Texas Radiological Society. These organizations represent doctors of radiology, as well as 26,868 medical imaging and radiation therapy technologists in Texas.

Any Alternative or New Recommendations on This Agency: Add the previous language from HB 3040 and SB 315 regarding RAs to the Texas Sunset Bill for the 86th Texas Legislature. Work with the Society of Radiology Physician Extenders, Texas Radiological Society, Texas Society of Radiologic Technologists, American Society of Radiologic Technologists, American College of Radiology, American Registry of Radiologic Technologists, and Certification Board for Radiology Practitioner Assistants for establishment of education, identification of supervising physician or radiology group.

My Comment Will Be Made Public: I agree